

NAOMI SHEFFIELD, OSB 170601
Senior Deputy City Attorney
naomi.sheffield@portlandoregon.gov
ELIZABETH C. WOODARD, OSB 075667
Deputy City Attorney
beth.woodard@portlandoregon.gov
Portland City Attorney's Office
1221 SW 4th Ave., Rm. 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089
Of Attorneys for Defendant City of Portland

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**TIANA TOZER, PHILIP RHODES,
BARBARA JACOBSEN, DANE
SOUTHARD, LORIEN ILENA
WELCHOFF, PAULINE LONG, MARK
BARNHILL, STEVE JACKSON, KEITH
MARTIN, and STEVEN REBISCHKE on
behalf of themselves and all others similarly
situated,**

Plaintiffs,

v.

CITY OF PORTLAND,

Defendant.

3:22-cv-01336-MO

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant City of Portland ("Defendant") moves this Court for an extension of time to file its responsive pleading or motion in response to Plaintiffs' Complaint. Counsel have conferred regarding this motion and Plaintiffs' counsel does not oppose Defendant's motion.

Specifically, Defendant respectfully requests an Order allowing an 85-day extension of

time from November 7, 2022, up to and including January 31, 2023, to file its responsive pleading or motion in response to Plaintiffs' Complaint.

This motion is based upon the complete court file and upon the declaration of Naomi Sheffield filed herewith.

Dated: October 26, 2022

Respectfully submitted,

/s/ Naomi Sheffield

NAOMI SHEFFIELD

OSB # 170601

Senior Deputy City Attorney

Telephone: (503) 823-4047

Of Attorneys for Defendant City of Portland